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Counsel for Ad Hoc Group of Subrogation Claim Holders

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Chapter 11
Bankr. Case No. 19-30088 (DM)
(Jointly Administered)

**NOTICE OF FILING OF INSURER
ADOPTION AGREEMENT REGARDING
MUTUAL MADE WHOLE RELEASE**

1 The Ad Hoc Group of Subrogation Claim Holders (the “**Ad Hoc Subrogation Group**”) in the
2 above-captioned chapter 11 cases of PG&E Corporation and Pacific Gas and Electric Company
3 (collectively, “**Debtors**”), by its attorneys Willkie Farr & Gallagher LLP and Diemer & Wei, LLP,
4 hereby submits this notice (the “**Notice**”) pursuant to the requirements of the Mutual Made Whole
5 Release. *See Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated*
6 *May 22, 2020* [Docket No. 7521] (the “**Plan**”) at Exhibit C.¹

7 **NOTICE**

8 WHEREAS paragraph I of the Mutual Made Whole Release provides, in part, that “[t]his
9 Mutual Release is conditioned upon the Insurer, or the Insurer’s successor on behalf of the Insurer,
10 filing in the Chapter 11 case the Insurer Adoption Agreement, which states the Insurer releases, as to
11 the Made Whole Doctrine only, each Claimant who signs and agrees to the terms of this Mutual
12 Release.”

13 NOW, THEREFORE, the Ad Hoc Subrogation Group attaches as Exhibit A to this Notice the
14 Insurer Adoption Agreement with all Insurers’ signatures collected to date.²

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¹ Capitalized terms used but not defined shall have the meanings ascribed in the Plan.

27² In the event that more Insurers sign the Insurer Adoption Agreement, the Ad Hoc Subrogation Group will file
28 subsequent notices in these bankruptcy cases.

1 Dated: June 22, 2020

2
3 **WILLKIE FARR & GALLAGHER LLP**

4
5 /s/ Matthew A. Feldman

6 Matthew A. Feldman (*pro hac vice*)

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